

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

David A. McDougall, Individually
and as Trustee for the Next-of-Kin of
Decedent Cynthia A. McDougall,

Plaintiff,

v.

CRC Industries, Inc., and John Doe
Company Defendants #1-10,

Defendants.

Case No. 20-cv-1499 (JRT/LIB)

**PLAINTIFF
DAVID A. McDOUGALL'S
DEPOSITION DESIGNATIONS**

Pursuant to the Court's November 14, 2023 Notice of Assignment of Cases for Trial and Trial Memorandum (ECF Nos. 146 and 146-1), and Federal Rule of Civil Procedure 26(a)(3), Plaintiff David A. McDougall hereby submits deposition designations for the following witnesses: Adam Selisker, 30(b)(6) of CRC Industries, Inc., Scott Grey, Michelle Rudnick, and Kyle Neumiller.

Plaintiff reserves the right to reduce designations depending on the flow and efficiency of trial, and to designate additional deposition testimony in response to deposition designations, exhibits, witnesses designated or disclosed by Defendant, and/or arguments raised at trial by Defendant. Plaintiff reserves the right to use additional deposition testimony for impeachment, rebuttal, foundation, and to the extent consistent with the

Federal Rules of Civil Procedure and the Federal Rules of Evidence as trial develops. Plaintiff waives no objection to any deposition testimony listed on Plaintiff's Deposition Designations.

Plaintiff's Deposition Designations
David A. McDougall v. CRC Industries, Inc.

September 14, 2022 Deposition of Adam Selisker

Adam Selisker	Adam Selisker
4:8 (starting with "Mr. Selisker")-9	82:2 (starting with "When was the")-
4:11-14	83:13
4:17-5:15	83:15-17
6:10-18	83:20-23
6:23-25	84:17-22
8:11-20	85:4-10
10:15-24	86:16 (starting with "What do you")-22
11:1-12:19	87:5 (starting with "What was the")-11
15:24-16:8	87:16-25
16:17-17:16	88:2-11
20:3-9	88:22
20:11-24	90:1 (starting with "So Mr. Selisker")-7
23:9-17	90:22-25
23:20-25:7	92:13-15
26:22-27:1	100:6 (starting at "am I correct")-9
27:14-16	100:19 (ending with "example")
31:21-32:22	100:20 (starting with "it looks like")-22
43:13-44:25	101:5-7
45:2-13	102:25-103:2
45:19-46:24	105:24-106:1
47:1-48:23	107:6 (starting with "And with
49:7-13	respect")-110:6
50:3-16	112:24-113:2
51:2-9	113:19-114:15
54:8-55:3	114:24-116:14
56:14-22	117:20 (starting with "Tell me")-24
58:3-7	118:4-5
61:6-62:10	118:7-9
75:5-78:13	118:16-21
81:2 (starting with "ACE got all")-6	120:8-121:1
81:8-10	123:4-22
81:15-21	138:6 (starting with "Is it fair")-139:20
	140:10-24
	149:24-150:7

Deposition Designations
David A. McDougall v. CRC Industries, Inc.

September 15, 2022 30(b)(6) of CRC Industries, Inc. via Adam Selisker

30(b)(6) of CRC Industries, Inc. via Adam Selisker	30(b)(6) of CRC Industries, Inc. via Adam Selisker
4:8 (starting with "Mr. Selisker")-10	66:25-68:9
4:17-5:23	68:21-69:24
5:25-6:10	72:11 (starting with "what did CRC")-24
8:17-9:6	76:13 (starting with "So you have")-79:17
17:21 (starting with "The product")-17:25	82:3 (starting with So CRC")-11
23:5 (starting with "Is")-7	82:12 (starting with "Describe for me")-84:1
23:14-16	84:11-85:2
23:18-24:1	86:17 (starting with "Did CRC")-23
24:4-9	86:25 (starting with "Did CRC")-87:3
24:12-13	87:12 (starting with "Tell me")-17
24:24 (starting with "Has CRC")-25:20	88:5 (starting with "Did")-9
27:15-19	90:5 (starting with "Please describe")-13
27:21-29:6	91:15-21
29:11 (starting with "What is 'narcosis'")-22	91:23-93:11
32:9-25	101:13-20
33:17-34:8	102:21 (starting with "has CRC")-25
34:14 (starting with "CRC decided")-24	110:11 (starting with "Tell me")-14
34:25 (starting with "And CRC")-35:15	110:21 (ending with "Exhibit 61")
36:22-37:15	111:4-7
37:23-38:5	111:14-112:2
40:25-41:5	116:3-25
45:18 (starting with "Did CRC")-46:5	117:14 (starting with "These are")-18
46:16-48:15	117:20-118:7
49:1-15	118:9-15
50:2-10	118:18 (starting with "At any point")-24
51:10 (starting with "At any point")-22	119:10 (starting with "At any point")-12
53:3-54:10	
60:19-62:13	
62:15 (starting at "please")-63:10	
64:3-66:1	

Deposition Designations

David A. McDougall v. CRC Industries, Inc.

September 7, 2022 Deposition of Scott Grey

Scott Grey	Scott Grey
4:3-10	77:10-12
4:17-20 (ending with “CRC Industries”)	77:14
6:5-7:5	83:5-10
7:11-17	83:20-23
8:2 (starting with “You worked”)-9:9	85:2-3
10:2-4	85:7-10
10:6 (starting with “CRC has”)-14	87:19-88:11
11:14-19	88:13
12:12 (starting with “In roughly 2007”)-22	89:6-90:1
15:19-20	91:21 (starting “You're aware”)-24
16:10 (starting with “Were you”)-17:4	92:11-14
17:14-21	110:3-6
18:18 (starting with “Do you have”)-25	111:3-12
19:13-18	111:18-22
21:13-22:20	112:4-5
23:2 (starting with “As I understand”)-18	112:16-113:12
25:22-26:1	113:13 (starting with “And the gross”)-15
32:9-13	120:5-121:1
32:16-21	121:9-16
38:17-39:16	121:18-122:5
56:16-57:6	126:4 (starting with “At one point”)-127:4
60:21-61:3	127:24 (starting with “And that in fact”)-128:2
62:3-23	133:3-134:1
66:24-68:13	135:1-13
70:3-11	135:17-21
70:13 (starting with “How would the”)-71:5	136:18-137:1
71:9-11	138:5-13
74:23-75:7	138:18 (starting with “During your tenure”)-139:8
75:18-76:20	140:2-4
76:24-77:3	

Scott Grey	Scott Grey
142:16 (starting with “Tell me about”)-143:9	164:17-18
144:21-25	164:20
150:18-151:22	164:24-165:20
160:5 (starting with “tell me what you”)-17	166:2-16
160:18 (“Yes” only)	166:20-22
160:23-162:1	168:3-13
162:18-163:2	168:15 (starting with “You know”)-24 (ending with “China”)

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September 1, 2022 Deposition of Michelle Rudnick

Michelle Rudnick	Michelle Rudnick
4:8 (starting with "Ms. Rudnick") -10	48:15
4:18-22	48:22 (starting with "What do you")-
5:15-23	49:23
6:19-23	52:20-53:17
7:3-14	65:20-21
7:22 (starting with "I understand")-8:5	65:24-66:8
13:10-23	66:10-14
14:6-22	66:17-20
16:1-5	66:23-67:1
16:16-21	67:4-9
20:25 (starting with "How many")-	67:12
21:10	67:18 (starting with "now I'd like")-
23:19-23	68:23
29:2-12	69:1-22
30:9-31:1	70:3-7
31:8-20	71:17-20
31:25	72:1
32:16 (starting with "You have")-33:25	72:4-17
34:21-35:16	73:8-18
35:21-36:3	73:20-74:9
37:2-23	74:14-16
38:11-39:14	74:23-75:20
39:20-22	76:13-77:5
40:3-41:18 (ending with "member")	77:11-16
42:3-6	78:8-79:4
42:23-43:7	79:8-80:17
43:18-21	80:20-81:4
44:9-22	82:6-18
45:23-47:4	82:22-83:8
47:9	83:18-23
47:13-14	83:25-84:11
47:17-48:1	84:17-86:14
48:4-13	99:25-100:9
	100:11-21

Michelle Rudnick	Michelle Rudnick
101:10-103:1	166:23-167:19
103:8-10	191:11-192:11
103:21-104:1	192:15-17
105:5-11	210:20-212:25
105:24-106:1	213:5 (starting with “And did you”)-
106:9-24	214:8
107:18-20	214:12-216:13
107:25-108:5	216:15-218:5
108:8-14	218:8-10
108:16-109:10	218:12-14
109:19-20	218:16
113:22-114:6	225:1-7
114:12-115:11	225:9
115:20-116:3	225:17-21
117:4-20	226:12-227:5
118:7-13	234:9-235:4
120:22-122:2	235:15 (starting with “In your
146:4-18	professional”)-236:2
146:24-147:6	236:5-14
147:17-21	236:20-24
151:20-152:2	237:1-238:1
165:1-166:12	238:8-15
166:14-20	239:10-14

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December 9, 2022 Deposition of Kyle Neumiller

Kyle Neumiller, Vol. I	Kyle Neumiller, Vol. I
3:20-22	68:19
4:8-9	68:21-23
4:12-16	70:2-8
23:16-22	70:23-24 (ending with
24:2-8	“MCDOUGALL000173”)
24:14-24	71:2-13
25:3-8	71:16-24
29:4-7	72:25-74:4
32:13-15	74:11-17
35:5-18	74:19-24
36:19-38:2	75:21-24
38:6-7	76:3-6
43:14-17	76:13-14
44:1-23	76:16
45:5-13	76:24-77:1
46:3-4 (ending with “5:50”)	77:3-5
46:15-16	77:11-16
46:18-23	77:19
47:12-16	77:23-78:1
47:18-48:16	78:5-9
48:24-49:13	78:12-17
49:18-21	78:24-25
49:25-50:4	79:2-4
50:7-13	79:6-80:2
51:10-12	81:6-7
55:5-24	81:9-11
56:1-10	81:15-22
57:13-58:16	81:24-25
59:5-14	82:6-13
65:17-66:1	83:2-3
66:4-6	83:5-7
66:16-67:2	83:9
67:7-12	85:14-18

Kyle Neumiller, Vol. I	Kyle Neumiller, Vol. I
85:20-21	98:12-14
86:6-14	98:17-99:3
86:19-87:7	101:6-11
87:9	101:13-102:3
87:13-21	102:13-17
90:20-25	102:24-25
91:2-6	103:4-104:8
91:8-11	104:10
91:13-92:14	104:18-21
92:16-20	105:3-6
92:22-93:1	105:14-16
93:3-4	105:18-106:7
93:9-22	106:9-22
93:24-94:5	106:24-107:6
94:9-12	107:8-12
94:19-95:8	107:14-20
95:17-21	107:22-108:24
96:8-24	109:1-3
97:12-14	109:5-21
97:16-23	109:23-110:1
98:3-5	110:5

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December 29, 2022 Deposition of Kyle Neumiller

Kyle Neumiller, Vol. II	Kyle Neumiller, Vol. II
118:19-120:12	154:14-25
120:14	155:9-156:11
121:3 (starting with "We can agree")-9	156:15-157:7
121:16-123:15	157:10-24
123:19-124:18	158:15-23
124:21-128:2	159:10-21
128:8-129:25	159:23-161:3
130:7-131:12	161:15-21
132:11-133:4	164:21-165:18
135:7-16	166:3-8
135:25-138:13	166:23-167:13
138:18-20	170:1-3
139:1-12	170:21-171:9
139:19-140:10	172:7-9
140:18-24	173:7-10
141:3-25	173:22-175:2
142:19-144:2	175:20-176:1
146:5-11	176:4-10
147:10-150:8	177:10-17
150:12-154:10	177:23-178:1

Respectfully submitted,

Dated: December 22, 2023

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